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10 UNITED STATES BANKRUPTCY COURT

11 DISTRICT OF NEVADA

12 In re
13 META MATERIALS INC.,
14 Debtor.

Case No.: 24-50792-hlb
(Chapter 7)

**EX PARTE APPLICATION BY CHAPTER
7 TRUSTEE TO EMPLOY THE LAW
FIRM OF SCHNEIDER WALLACE
COTTRELL KONECKY LLP AS
SPECIAL LITIGATION COUNSEL**

Hearing Date: N/A
Hearing Time:

17 Pursuant to 11 U.S.C. § 328(a) and F.R.Bankr.P. 2014, Christina Lovato, the duly
18 appointed and acting chapter 7 trustee ("Trustee"), requests an order authorizing the employment
19 of the law firm of Schneider Wallace Cottrell Konecky LLP (the "Firm"), to act as special counsel
20 for the Chapter 7 estate of Meta Materials, Inc., ("Debtor" or "Estate"). The Firm will join with
21 Christian Attar and Kasowitz, Torres & Benson, to investigate potential claims and, if meritorious,
22 pursue litigation related to suspected stock manipulation through illegal trading practices such as
23 'naked short selling' and 'spoofing.'

24 This Application is supported by the separately filed Rule 2014 Declarations of Ryan R.
25 C. Hicks, Jason H. Kim and David D. Burnett. In support of this Application, the Trustee
26 represents as follows:

27 1. Debtor Meta Materials Inc. filed a chapter 7 petition on August 9, 2024 ("Petition
28 Date"), and Christina Lovato was duly appointed as the Chapter 7 trustee ("Trustee").

2. In fulfilling her duties under § 704, and based upon her investigation of the events leading up to the filing of the Chapter 7 case, the Trustee has previously sought and obtained approval to employ law firms which hold expertise in specialized areas of securities-related litigation: Christina Attar and Kasowitz, Torres & Benson. A summary of the potential litigation is identified at **[ECF No. 98-1]**.

3. As lead counsel on the securities matters, Christian Attar believes it to be in the best interest of the Meta estate to engage the Firm to expand the litigation team.

4. The Firm will undertake the engagement under the same contingency basis as that agreed to by Christian Attar and Kasowitz, Torres & Benson. A copy of the Contingent Fee Agreement which, in all material respects, is identical to the agreement approved for Christian Attar and Kasowitz, Benson & Torres is attached to this Application as **Exhibit A**.

5. To the best of the Trustee's knowledge, the Firm does not represent any interests adverse to the Estate in the matters upon which it is to be engaged and is disinterested as that term is defined in 11 U.S.C. § 101(14). There are no present connections which the Firm and/or its employees have with the Estate, any of its creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee.

WHEREFORE, the Trustee requests that employment of the law firm of Schneider Wallace Cottrell Konecky LLP be approved by this Court, effective as of the date of the order approving employment, for the purpose and on the terms and conditions set forth above.

DATED: May 21, 2025.

HARTMAN & HARTMAN

/s/ Jeffrey L. Hartman

Jeffrey L. Hartman, Esq., Attorney for
Christina Lovato, Trustee

APPROVED

/s/ Christina Lovato

Christina Lovato, Trustee